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11 Attorneys for Defendants
METROPOLITAN TRANSPORTATION
12 COMMISSION and CITY AND
COUNTY OF SAN FRANCISCO
13

14 UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
15

16 JOHN SCHULZ,

17 Plaintiff,

18 v.

19 METROPOLITAN TRANSPORTATION
COMMISSION; and CITY AND COUNTY OF
20 SAN FRANCISCO

21 Defendants.

Case No. 3:19-cv-02134-MMC

Civil Rights

**STIPULATION AND [PROPOSED]
ORDER DISMISSING ENTIRE ACTION
WITH PREJUDICE**

22
23 **STIPULATION**

24 Plaintiff JOHN SCHULZ ("Plaintiff") and Defendants METROPOLITAN
25 TRANSPORTATION COMMISSION; and CITY AND COUNTY OF SAN FRANCISCO
26 ("Defendants") – Plaintiff and Defendants together the "Parties" – hereby stipulate and request
27 that pursuant to Federal Rules of Civil Procedure 41(a)(1)(A)(ii), the above-captioned action be
28 dismissed with prejudice in its entirety. Each side shall pay its own attorneys' fees and costs,

1 except as expressly set forth in a Settlement Agreement between the parties.

2 In accordance with Paragraph 9 of General Order 56, the Parties request that the Court
3 retain jurisdiction to enforce the injunctive relief measures specified in Exhibit A attached hereto.

4 **IT IS SO STIPULATED.**

5 Dated: April 26, 2021

REIN & CLEFTON

/s/ Aaron M. Clefton

6 By: AARON M. CLEFTON, ESQ.

7 Attorneys for Plaintiff

JOHN SCHULZ

9 Dated: April 26, 2021

FOLGER LEVIN LLP

/s/ Jiyun Cameron Lee

10 By: JIYUN CAMERON LEE, ESQ.

11 Attorneys for Defendants

METROPOLITAN TRANSPORTATION

12 COMMISSION and CITY AND

COUNTY OF SAN FRANCISCO

13 **FILER'S ATTESTATION**

14 Pursuant to Local Rule 5-1, I hereby attest that on April 26, 2021, I, Aaron Clefton,
15 attorney with Rein & Clefton, received the concurrence of Jiyun Cameron Lee, counsel for
16 Defendants, in the filing of this document.

17 /s/ Aaron M. Clefton

18 Aaron M. Clefton

19 **[PROPOSED] ORDER**

20 Pursuant to the stipulation of the parties, and for good cause shown, IT IS SO ORDERED.
21 Defendants shall perform the work specified in Exhibit A. The Court shall retain jurisdiction to
22 enforce the work contemplated to be done in Exhibit A and the Parties' separate Settlement
23 Agreement as to monetary terms.

24 **IT IS SO ORDERED.**

25
26 Dated: June 7, 2021

27 
Honorable Maxine M. Chesney
United States District Court Judge